

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

|  |                                    |
|--|------------------------------------|
| In Re:                                       | : Bankruptcy No. 1:19-bk-02237-HWV |
| John Dagenhart and Angella Dagenhart         | : Chapter 13                       |
| Debtors                                      | :                                  |
|  | :                                  |
|  | :                                  |
| U.S Bank Trust National Association, not in  | :                                  |
| its individual capacity, but solely as Owner | :                                  |
| Trustee on behalf for Citigroup Mortgage     | :                                  |
| Loan Trust 2021-RP4 c/o Rushmore Loan        | :                                  |
| Management Services, LLC                     | :                                  |
| Movant                                       | :                                  |
| vs.  | :                                  |
| John Dagenhart and Angella Dagenhart         | :                                  |
|  | :                                  |
|  | :                                  |
| Debtors/Respondents                          | :                                  |
| and  | :                                  |
| Jack N. Zaharopoulos, Esquire                | :                                  |
| Trustee/Respondent                           | :                                  |

**WITHDRAWAL OF RESPONSE TO NOTICE OF MORTGAGE PAYMENT CHANGE**

TO THE CLERK:

Please mark the Response to Notice of Mortgage Payment Change, filed on June 2, 2023 as Doc. #60, as withdrawn without prejudice.

Respectfully submitted,

/s/Sarah K. McCaffery, Esquire  
Sarah K. McCaffery, Esquire  
Hladik, Onorato & Federman, LLP  
298 Wissahickon Avenue  
North Wales, PA 19454  
Phone 215-855-9521  
Fax 215-855-9121

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|  | :                                  |
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| Debtors/Respondents                          | :                                  |
| and  | :                                  |
| Jack N. Zaharopoulos, Esquire                | :                                  |
| Trustee/Respondent                           | :                                  |

**CERTIFICATE OF MAILING**

I, Sarah K. McCaffery, certify under penalty of perjury that I served a copy of the Withdrawal of the Response to Notice of Mortgage Payment Change Objection to Confirmation of the Plan to the parties at the addresses shown below on June 02, 2023.

The types of service made on parties were: Electronic Notification and First Class Mail:

Hannah Herman-Snyder, Esquire  
Via ECF  
*Attorney for Debtors*

Jack N. Zaharopoulos, Esquire  
Via ECF  
*Trustee*

John Dagenhart  
Angella Dagenhart  
6233 Greenbriar Terrace  
Fayetteville, PA 17222  
Via First Class Mail  
*Debtors*

Dated: 06/02/2023

/s/Sarah K. McCaffery, Esquire  
Sarah K. McCaffery, Esquire  
Hladik, Onorato & Federman, LLP  
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North Wales, PA 19454  
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